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I-DOCSECURE, LLC; E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC and JOSEPH BAGGIO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ISMART INTERNATIONAL LIMITED,

Plaintiff,

vs.

I-DOCSECURE, LLC, a California limited liability
company; E-NETSECURE SERVICES, INC., a
California corporation; INTEGRITY DATA
APPLICATIONS CONSULTING, LLC, a
California limited liability company; ISMART
SECURE LLC, a Delaware limited liability
company; JOSEPH BAGGIO, an individual;
JONATHAN BALZORA, an individual,

Defendants.

AND RELATED COUNTER CLAIM.

CASE NO. C 04-03114 RMW

**STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL WITH
PREJUDICE OF
COUNTERDEFENDANT RAJ
DHESIKAN AND DEFENDANTS
JONATHAN BALZORA AND
INTEGRITY DATA APPLICATIONS
CONSULTING, LLC**

CASE NO. C 04-03114 RMW

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE OF COUNTERDEFENDANT RAJ DHESIKAN AND
DEFENDANTS JONATHAN BALZORA AND INTEGRITY DATA APPLICATIONS CONSULTING, LLC

STIPULATION

Pursuant to Federal Rule of Civil Procedure 41(a), the parties in this action stipulate as follows:

1. PLAINTIFF ISMART INTERNATIONAL LIMITED ("PLAINTIFF" or "ISMART") through its attorneys of record hereby stipulates to dismiss with prejudice the First Amended Complaint in its entirety solely as to DEFENDANTS INTEGRITY DATA APPLICATIONS CONSULTING, LLC ("INTEGRITY") and JONATHAN BALZORA ("BALZORA").

2. PLAINTIFF through its attorneys of record also agrees to stipulate to waive all rights to pursue costs and attorneys' fees against INTEGRITY and BALZORA.

3. COUNTERCLAIMANTS I-DOCSECURE, LLC; E-NETSECURE SERVICES, INC.; ISMART SECURE, LLC; AND JOSEPH BAGGIO ("COUNTERCLAIMANTS") through their attorneys of record hereby stipulate to dismiss with prejudice their Counterclaims in their entirety against COUNTERDEFENDANT RAJ DHESIKAN ("DHESIKAN").

4. COUNTERCLAIMANTS through their attorneys of record also stipulate to waive all rights to pursue costs and attorneys' fees against DHESIKAN.

5. INTEGRITY and BALZORA, through their attorneys of record stipulate to waive all rights to pursue costs and attorneys' fees against PLAINTIFF.

6. DHESIKAN, thorough his attorneys of record stipulate to waive all rights to pursue costs and attorneys' fees against COUNTERCLAIMANTS.

SO STIPULATED.

DATED: October 4, 2006

SULLWOLD & HUGHES

By: 

JAMES A. HUGHES

Attorneys for Defendants INTEGRITY DATA
APPLICATIONS CONSULTING, LLC and
JONATHAN BALZORA

1 DATED: October 4, 2006

2 SEDGWICK, DETERT, MORAN & ARNOLD, LLP

3
4 By: 

CHRISTOPHER J. KENLER

5 Attorneys for Plaintiff and Counter-defendant
6 ISMART INTERNATIONAL LIMITED and
Counter-defendant RAJ DHESIKAN

7 DATED: October ___, 2006

PAUL, HASTING, JANOFSKY & WALKER, LLP

8
9 By: _____

MICHAEL EDELMAN

10 Defendants and Counterclaimants I-DOCSECURE,
11 LLC, E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC and JOSEPH BAGGIO

12
13 **ORDER**

14 The Court hereby dismisses with prejudice the First Amended Complaint in this matter as to
15 Defendants Integrity Data Applications Consulting, Inc. and Jonathan Balzora. The Court hereby
16 dismisses with prejudice the Counterclaims in this matter against Counterdefendant Raj Dhesikan.
17 No party shall be entitled to pursue costs or attorneys' fees against Defendants Integrity Data
18 Applications Consulting, LLC or Jonathan Balzora or Counterdefendant Raj Dhesikan, Balzora and
19 Integrity shall not be entitled to pursue costs or attorneys' fees against Plaintiff and Dhesikan shall
20 not be entitled to pursue costs or attorneys' fees against Counterclaimants.

21
22 **IT IS SO ORDERED.**

23
24 DATED: _____

Hon. Ronald M. Whyte

UNITED STATES DISTRICT JUDGE

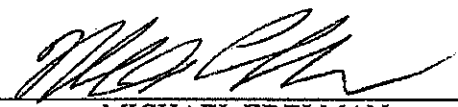
1 DATED: October 4, 2006

2 SEDGWICK, DETERT, MORAN & ARNOLD, LLP

3
4 By: CHRISTOPHER J. KELLER
5 Attorneys for Plaintiff and Counter-defendant
6 ISMART INTERNATIONAL LIMITED and
Counter-defendant RAJ DHESIKAN

7 DATED: October 5, 2006

8 PAUL, HASTING, JANOFSKY & WALKER, LLP


9 By: 
10 MICHAEL EDELMAN
11 Defendants and Counterclaimants I-DOCSECURE,
12 LLC, E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC and JOSEPH BAGGIO

13 **ORDER**

14 The Court hereby dismisses with prejudice the First Amended Complaint in this matter as to
15 Defendants Integrity Data Applications Consulting, Inc. and Jonathan Balzora. The Court hereby
16 dismisses with prejudice the Counterclaims in this matter against Counterdefendant Raj Dhesikan.
17 No party shall be entitled to pursue costs or attorneys' fees against Defendants Integrity Data
18 Applications Consulting, LLC or Jonathan Balzora or Counterdefendant Raj Dhesikan, Balzora and
19 Integrity shall not be entitled to pursue costs or attorneys' fees against Plaintiff and Dhesikan shall
20 not be entitled to pursue costs or attorneys' fees against Counterclaimants.

21
22 **IT IS SO ORDERED.**

23
24 DATED: 10/11/06


Hon. Ronald M. Whyte
UNITED STATES DISTRICT JUDGE